

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 2:20-cr-101-3
)	
JOHN H. QUESNEL,)	
Defendant.)	

GOVERNMENT'S MOTION FOR REVOCATION OF CONDITIONS OF RELEASE

The United States of America, by and through its attorney, Jonathan A. Ophardt, Acting United States Attorney for the District of Vermont, files this motion to revoke the defendant's release pursuant to 18 U.S.C. § 3148.

John Quesnel, one of the defendants in the above-captioned case, is charged with one count of conspiring to distribute and possess with intent to distribute controlled substances in violation of Title 21, United States Code, sections 846 and 841. [No. 10.] The defendant was arraigned and pleaded not guilty to the charge on November 12, 2020. [No. 31, 32.] The United States did not seek the defendant's detention at the time of the initial hearing, and the defendant was released on conditions of supervision pending further proceedings. [No. 32, 34.] He was thereafter arrested on December 11, 2020 on a warrant issued following the filing of a revocation motion of the United States. [No. 61.] John Quesnel was then released again subject to conditions of supervision on December 23, 2020. [No. 73.]

The conditions of supervision for the defendant's pretrial release included that the defendant refrain from use or unlawful possession of a narcotic drug or other controlled substances defined in 21 U.S.C. § 802, unless prescribed by a licensed medical practitioner. [No. 73, Condition 8(p).] Based upon information received from Senior U.S. Probation Officer

(PO) Shawna Lapierre received on April 4, 2021, the defendant has again violated his conditions of release. The defendant admitted to his supervising officer that he had used cocaine on at least two occasions—March 2 and March 28, 2021.

The information presented by PO Lapierre constitutes clear and convincing evidence that the defendant has violated conditions of his pretrial release. Pursuant to Title 18, United States Code, Section 3148, the United States asserts that the defendant is subject to revocation of the Court's release order. Accordingly, the government requests that the Court set a hearing for the defendant to appear before the Court to show cause why his conditions of release should not be revoked. The United States does not request a warrant for the defendant's arrest at this time.

Dated at Burlington, in the District of Vermont, this 2nd day of April, 2021.

Respectfully submitted,

UNITED STATES OF AMERICA

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